



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

MCAQD

August 27, 2009

SEP - 3 2009

Office of the Director

Lawrence Odle
Director
Maricopa County Air Quality Department
1001 North Central Avenue, Suite #500
Phoenix, AZ 85004

Subject: Concurrence on Alternative Moisture Testing Method with Speedy Moisture Meter

Dear Mr. Odle:

Section 301.2(c) of the March 12, 2008 version of Maricopa County Air Quality Department (MCAQD) Rule 316 requires facilities to operate watering systems to continuously maintain a 4% minimum moisture content, and Section 301.2(c)(3) and 502.3 specify requirements for soil moisture testing. Section 502.3(g) requires that moisture testing be conducted with ASTM C566-97(2004), "Standard Test Method for Total Evaporable Moisture Content of Aggregate by Drying." We have received your July 15, 2009 request for EPA concurrence for the approval of the Speedy Moisture Meter as an alternative to ASTM C566-97(2004).

We understand that Maricopa County is currently working on draft changes to Rule 316, and may insert a provision in the rule that allows EPA and Maricopa County to approve alternative moisture content test methods. If rule amendments include a provision for the approval of alternative moisture content test methods, we think it is reasonable for MCAQD to allow a facility to use the Speedy Moisture Meter if MCAQD receives and approves a written request from the facility that includes the following:

1. A description of the alternative testing equipment, tester limitations, including the range of the dial, and maintenance requirements;
2. A correlation analysis conducted using 20 samples from the Speedy Moisture Meter and results using ASTM C566-97(2004). A separate correlation analysis shall be done for each unit (serial number shall be specified);
3. A description of the calibration procedures that includes the following:
 - Calibration of each Speedy Moisture Meter (serial number shall be specified) on at least a biweekly basis against ASTM C566-97(2004) as a standard;
 - Identification of at least 3 sampling points per process line to be used for calibration in either the Operation and Maintenance Plan required per Section 305.2 of Rule 316 or the Dust Control Plan required per Section 311. The three points shall be at the beginning of

the process, mid-process (e.g., after a secondary crusher or primary screen), and at the end of the process.

4. An agreement to revert to ASTM C566-97(2004) if the Speedy Moisture Meter results do not correlate with ASTM C566-97(2004).
5. Modification of the site specific Operation and Maintenance Plan or Dust Control Plan to include 3 and 4 above.

If you have any questions, please do not hesitate to contact Sona Chilingaryan of my staff at (415) 972-3368 or John Brock in our Enforcement Office at (415) 972-3999.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Steckel". The signature is fluid and cursive, with the first name "Andrew" written in a larger, more prominent script than the last name "Steckel".

Andrew Steckel
Chief, Rulemaking Office